

Illinois Tool Works Inc
Corporate Headquarters
155 Harlem Avenue
Glenview, Illinois 60025
Telephone 847 724 7500
Direct Dial 224.661 7784

US EPA RECORDS CENTER REGION 5



RECEIVED SEP 26 2017



September 25, 2017

Fouad Dababneh, Enforcement Specialist
U.S. Environmental Protection Agency, Region 5
Superfund Division – Emergency Response Branch #2
Enforcement Services Section, SE-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Response to Request for Information
AA Oil Site
2340 South Tibbs Avenue, Indianapolis, Indiana
Site Spill Identification Number: C54L

Dear Mr. Dababneh:

Please find the enclosed response to the U.S. Environmental Protection Agency (“USEPA”) Request for Information (“RFI”) dated August 23, 2017 and addressed to Illinois Tool Works Inc. (“ITW”) regarding the AA Oil Site described above (“Site”).

J. Matthew Moore, USEPA Associate General Counsel, granted a two-week extension to the deadline for ITW’s response to the RFI via email on September 15, 2017. As noted in the enclosed response, it is impracticable for ITW to respond to most of the RFI questions at this time.

ITW denies all liability with respect to the Site and reserves all of its rights and defenses in this matter.

Sincerely,

Ken Brown, CHMM
Manager of Environmental
& Chemical Compliance

Enclosures

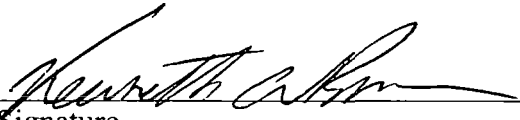
**General objections of ITW
to RFI in regard to the Site**

1. ITW objects to the RFI to the extent it seeks information contained in documents readily available to USEPA from the files of federal, state, and local agencies.
2. ITW objects to the RFI to the extent that it is unduly burdensome, oppressive, overly broad, and unreasonable.
3. ITW objects to the RFI to the extent it seeks information protected by the attorney-client privilege, the attorney work-product doctrine, or any applicable privilege or rule that protects such information from disclosure.
4. ITW objects to the RFI to the extent it seeks information that is not calculated to discover information relevant to the Site.

Declaration

I declare under penalty of perjury that I am authorized to respond on behalf of the Respondent and that the foregoing is complete, true, and correct.

Executed on September 25, 2017.


Signature

Kenneth A Brown
Name

Manager of Env. &
Title
Chemical Compliance

**RESPONSE TO RFI
AA Oil Site
Indianapolis, Indiana**

1. Individual answering questions on behalf of ITW:

Ken Brown, CHMM
Manager of Environmental & Chemical Compliance
(employed by ITW or its subsidiary since June 1993)
155 Harlem Avenue
Glenview, Illinois 60025
P: 224-661-7784
E: kbrown@itw.com

2. Documents Consulted:

The ITW Legal Storage search tool was utilized to identify files containing relevant information regarding the Site. No such files were identified. There was no information in the RFI regarding the particular ITW business that allegedly utilized the Site. In response to an email inquiry by ITW, USEPA subsequently indicated that the relevant ITW business was Ransburg. No specific Ransburg facility location or other relevant information was identified by USEPA. ITW divested its former Industrial Finishing Business (including Ransburg) in 2012. Records related to business operations of the Industrial Finishing Business were transferred in the divestiture and were not retained by ITW.

3. Company's policy with respect to document retention:

Most business records are retained from 3 to 7 years depending on the business function involved per the ITW Records Management Policy.

4. Persons able to provide a more detailed or complete response:

It is impracticable for ITW to respond to this question based on information provided by USEPA.

5. Company's present operational status:

ITW's former Ransburg business was divested in 2012 as described in the response to Question 2 above. ITW has no ownership or operational control with respect to its former Industrial Finishing Businesses and is unable to respond with respect to its operational status. ITW's operational status is active.

6. Date and state in which the Company was incorporated:

ITW was incorporated on June 19, 1961 in Delaware.

7. Identify the business structure of the Company:

ITW has operated as a corporation since 1961.

8. Describe the nature of your business.

ITW is a highly decentralized manufacturing company comprised of the following business segments:

Automotive, Construction, Food Equipment, Polymers & Fluids, Specialty Products, Test & Measurement and Electronics, and Welding.

a. Describe raw materials, manufacturing processes, and products.

ITW utilizes a wide variety of raw materials and manufacturing processes within its business segments. It is impracticable for ITW to respond to this question in a manner relevant to the Site based on information provided by USEPA.

b. Changes in nature of your business since 1980.

It is impracticable for ITW to respond to this question in a manner relevant to the Site based on information provided by USEPA.

9. Dates the Company generated or arranged for transportation of waste to the Site.

ITW has not located any records of waste shipments to the Site.

10. List of employees who had knowledge of the generation, transport and disposal of wastes at the Site.

ITW has not located any records regarding waste shipments to the Site.

11. List of all materials transported or disposed at the Site.

ITW has not located any records regarding any shipments to the Site.

12. If Company transported oil to the Site, respond to the list of requests.

ITW has not located any records regarding oil shipments to the Site.

13. Identify and provide listed information for all hazardous waste transported to the Site.

ITW has not located any records regarding hazardous waste shipments to the Site.

14. List and provide copies of all permits, licenses, and/or registrations issued concerning your operations and the storage, use, and discharge of substances.

It is impracticable for ITW to respond to this question in a manner relevant to the Site based on information provided by USEPA.

15. State whether Company has or had a permit or permits issued under RCRA.

It is impracticable for ITW to respond to this question in a manner relevant to the Site based on information provided by USEPA.

16. Provide copies of all correspondence between the Company and the Site owners and operators regarding material that came to be located at the Site.

ITW has not located any correspondence among it and the Site owners or operators.

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UPS CampusShip: View/Print Label

- 1 **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function, select Print from the File menu to print the label.
- 2 **Fold the printed label at the solid line below.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
- 3 **GETTING YOUR SHIPMENT TO UPS**
Customers with a Daily Pickup
Your driver will pickup your shipment(s) as usual.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®, UPS Access Point™ location, UPS Drop Box, UPS Customer Center, Staples® or Authorized Shipping Outlet near you. Items sent via UPS Return Services® (SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.

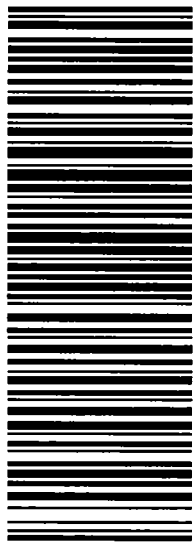
Hand the package to any UPS driver in your area.

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THE UPS STORE
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NILES, IL 60714

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KEN BROWI 2246617784 ITW CORPORATE 155 HARLEM AVE GLENVIEW, IL 60025	0.0 LBS LTR	1 OF 1
SHIP TO: FOUAD DABABNEH 312-353-3944 U.S. EPA REGION 5 ENFORCEMENT SERVICES SECT. - SE-5J SUPERFUND DIVISION - ERB #2 77 WEST JACKSON BOULEVARD CHICAGO IL 60604-3511		
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